

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

GENOVA BURNS LLC

Daniel M. Stoltz, Esq.
Donald W. Clarke, Esq.
Gregory S. Kinoian, Esq.
Leonard S. Spinelli, Esq.
dstolz@genovaburns.com
dclarke@genovaburns.com
gkinoian@genovaburns.com
lspinelli@genovaburns.com
110 Allen Road, Suite 304
Basking Ridge, NJ 07920
Tel: (973) 467-2700
Fax: (973) 467-8126

Proposed Local Counsel for the Official Committee of Talc Claimants

BROWN RUDNICK LLP

David J. Molton, Esq.
Robert J. Stark, Esq.
Michael S. Winograd, Esq.
dmolton@brownrudnick.com
rstark@brownrudnick.com
mwinograd@brownrudnick.com
Seven Times Square
New York, NY 10036
Tel: (212) 209-4800
Fax: (212) 209-4801

and

Jeffrey L. Jonas, Esq.
Sunni P. Beville, Esq.
Eric R. Goodman, Esq.
jjonas@brownrudnick.com
sbeville@brownrudnick.com
egoodman@brownrudnick.com
One Financial Center
Boston, MA 02111
Tel: (617) 856-8200
Fax: (617) 856-8201

Proposed Co-Counsel for the Official Committee of Talc Claimants

OTTERBOURG PC

Melanie L. Cyganowski, Esq.
Adam C. Silverstein, Esq.
Jennifer S. Feeney, Esq.
mcyganowski@otterbourg.com
asilverstein@otterbourg.com
jfeeney@otterbourg.com
230 Park Avenue
New York, NY 10169
Tel: (212) 905-3628
Fax: (212) 682-6104
Proposed Co-Counsel for the Official Committee of Talc Claimants

MASSEY & GAIL LLP

Jonathan S. Massey, Esq.
Rachel S. Morse, Esq.
jmassey@masseygail.com
rmorse@masseygail.com
1000 Maine Ave. SW, Suite 450
Washington, DC 20024
Tel: (202) 652-4511
Fax: (312) 379-0467
Proposed Special Counsel for the Official Committee of Talc Claimants

In re:	Chapter 11
LTL MANAGEMENT LLC,¹	Case No.: 23-12825 (MBK)
Debtor.	Honorable Michael B. Kaplan

SUPPLEMENTAL CERTIFICATION OF SUNNI P. BEVILLE IN SUPPORT OF THE APPLICATION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS TO RETAIN AND EMPLOY BROWN RUDNICK LLP AS CO-COUNSEL EFFECTIVE AS OF APRIL 14, 2023

Pursuant to 11 U.S.C. § 1746, I, hereby declare:

1. I am an attorney at law admitted to practice in the courts of the State of Massachusetts and the United States District Court for the District of Massachusetts.

2. I am also Managing Director of the Dispute Resolution & Restructuring Department and a Partner in the Bankruptcy & Corporate Restructuring Practice Group at Brown Rudnick LLP (“Brown Rudnick”) and am duly authorized to make this supplemental certification (the “Supplemental Certification”) on behalf of Brown Rudnick. Brown Rudnick is proposed co-counsel to the Official Committee of Talc Claimants (the “Committee” or “TCC”) of LTL Management LLC, the debtor and debtor-in-possession (the “Debtor”) in the above-captioned case.

3. On May 3, 2023, Brown Rudnick filed the *Application of the Official Committee of Talc Claimants to Retain and Employ Brown Rudnick LLP as Co-Counsel Effective as of April 14, 2023* [Dkt. No. 400] (the “Application”)² seeking entry of an order authorizing and approving the retention and employment of Brown Rudnick as co-counsel to the TCC. In support of the Application, I submitted the *Certification of Professional in Support of Application for Retention*

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

² Capitalized terms used in this Supplemental Certification but not otherwise defined herein shall have the meanings ascribed to them in the Application.

of Professional (the “Original Certification”) attached thereto as Exhibit B, which is incorporated by reference.

4. On May 8, 2023, the Court ordered the appointment of Gary Russo and Eric Green to serve as co-mediators in accordance with mediation protocols set forth therein (the “Mediation Order”). [Dkt. No. 459].

5. The Application provides that Brown Rudnick will file a supplemental certification if any new relevant facts or relationships are discovered or arise with respect to its conflicts disclosures made therein. Application ¶ 27. I now submit this Supplemental Certification in accordance with paragraph 27 of the Application in light of the Mediation Order.

6. Brown Rudnick represents Eric Green in the following two engagements:

- a. in Mr. Green’s capacity as the Trustee of the PSAN PI/WD Trust established in the bankruptcy cases of *TK Holdings, Inc.* proceeding in the Bankruptcy Court for the District of Delaware, Judge Brendan Shannon presiding, under the case captioned *In re TK Holdings Inc.*, Case No. 17-11375; and
- b. in Mr. Green’s capacity as Court-Appointed Special Master of the United States Department of Justice Individual Restitution Fund established in the criminal case proceeding in the U.S. District Court for the Eastern District of Michigan, Judge Carem Steeh presiding, under the case captioned *United States of America v. Takata Corporation*, Case No. 16-CR-20810-04.

7. Brown Rudnick does not believe these engagements of Mr. Green, a Co-Mediator, on matters unrelated to this case create any conflicts.

8. Brown Rudnick will continue to provide supplemental disclosures as provided in the Application.

Pursuant to 11 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: May 18, 2023



Sunni P. Beville